



U.S. Department of Energy  
**Office of River Protection**

P.O. Box 450  
Richland, Washington 99352

03-OSR-0057

FEB 28 2003

Mr. R. F. Naventi, Project Manager  
Bechtel National, Inc.  
2435 Stevens Center  
Richland, Washington 99352

Dear Mr. Naventi:

CONTRACT NO. DE-AC27-01RV14136 -BECHTEL NATIONAL, INC. (BNI) SUBMISSION  
OF AUTHORIZATION BASIS CHANGE NOTICES (ABCN) WITHOUT A SAFETY  
EVALUATION SUMMARY

- References:
1. BNI letter from R. F. Naventi to R. J. Schepens, ORP, "Transmittal for Information - Authorization Basis Change Notices 24590-WTP-ABCN-ENS-02-005, Revision 0, *Changes to High-Integrity Crane Control Requirements* and 24590-WTP-ABCN-ENS-02-035, Revision 0, *HLW and PTF PSAR Revisions Regarding SDS Shield Doors*," CCN 047335, dated December 26, 2002.
  2. BNI letter from R. F. Naventi to R. J. Schepens, ORP, "Transmittal for Information - Authorization Basis Change Notices," CCN 047345, dated January 23, 2003.
  3. BNI letter from R. F. Naventi to R. J. Schepens, ORP, "Transmittal for Information - Authorization Basis Change Notices," CCN 047344, dated January 23, 2003.

This letter informs BNI that the ABCNs submitted in the References to the U.S. Department of Energy (DOE), Office of River Protection (ORP) did not provide a summary of the safety evaluation for the change. Contract No. DE-AC27-01RV14136 states in Standard 7 Section (e) (2) (iii) the Contractor's Integrated Safety Management Plan shall conform with RL/REG-97-13, *Office of River Protection Position on Contractor-Initiated Changes to the Authorization Basis*. The ABCNs submitted in the References (listed in the Attachment) did not include a summary of the safety evaluation as required by RL/REG-97-13, Revision 9, Section 3.5.a, Paragraph 2.iv. Rather, the ABCNs included a checked block that contained the following statement: "The change provides adequate safety because the applicable questions on the Safety Evaluation have been answered in a way that ensures adequate safety following the change." This statement is not an acceptable summary of a safety evaluation.

Mr. R. F. Naventi  
03-OSR-0057

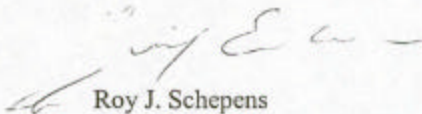
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Please correct these deficiencies and resubmit the ABCNs. Based on staff discussions between Lewis F. Miller, Jr., ORP, and Dennis Klein, BNI, corrective actions for this oversight will be included in your response to Inspection Report A-03-OSR-RPPWTP-007 which identified similar deficiencies. Therefore, a separate response to this letter is not requested.

If you have any questions, please contact me, or your staff may call Walter J. Pasciak, WTP Safety Regulation Division, (509) 373-9189.

Sincerely,



Roy J. Schepens  
Manager

OSR:WJP

Attachment

LIST OF AUTHORIZATION BASIS CHANGE REQUESTS THAT REQUIRE A  
SAFETY EVALUATION SUMMARY

- 24590-WTP-ABCN-ENS-02-005, Revision 0, *Changes to High-Integrity Crane Control Requirements*
- 24590-WTP-ABCN-ENS-02-008, Revision 0, *LAW General Update of PSAR from P&ID Checklist Review*
- 24590-WTP-ABCN-ENS-02-009, Revision 0, *Revision to Pretreatment PSAR to Reflect System RWH Removal of Drum Lidding Machine and Drum Transfer Drawer*
- 24590-WTP-ABCN-ENS-02-010, Revision 0, *System LSH Equipment and Operations Description Modification*
- 24590-WTP-ABCN-ENS-02-014, Revision 0, *HLW Pour Tunnel Lidding Station Removal & Canister Rack Modifications*
- 24590-WTP-ABCN-ENS-02-016, Revision 0, *Reagent Supply System Design Update*
- 24590-WTP-ABCN-ENS-02-017, Revision 0, *HLW Vitrification system HMH PSAR Modification*
- 24590-WTP-ABCN-ENS-02-022, Revision 0, *Update LAW PSAR*
- 24590-WTP-ABCN-ENS-02-023, Revision 0, *Update HLW PSAR*
- 24590-WTP-ABCN-ENS-02-028, Revision 0, *Design Changes Associated with High Level Waste Vitrification System HSH-Mechanical Handling Diagram-Melter Caver Support Handling – Melter Cave 1*
- 24590-WTP-ABCN-ENS-02-038, Revision 0, *Alignment of System HFH Rev 0 Mechanical Handling Diagram with the HLW Authorization Basis*
- 24590-WTP-ABCN-ENS-02-046, Revision 0, *Revision to HLW PSAR to Reflect System RWH Drum Lidding Modifications and Drum Assay Removal*
- 24590-WTP-ABCN-ENS-02-047, Revision 0, *Melter Offgas (HOP) System AB Compliance*
- 24590-WTP-ABCN-ENS-02-048, Revision 0, *ITS Instrument Service Air (ISA) AB Compliance*